

Comment Letters  
received by the  
Regional Board  
regarding Sensitive  
Watershed Nomination

**PALCO****THE PACIFIC LUMBER COMPANY**P.O. Box 37, Scotia, CA 95565 (707) 764-2222

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June 25, 2003

Mr. William Massey, Chairman  
Members of the Board  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd., Suite A  
Santa Rosa, CA 95403

Dear Chairman Massey and Members:

I am writing to urge the Board to reject the staff's recommendation that the Elk River watershed be nominated to the Board of Forestry for designation as a "Sensitive Watershed." We do not believe that this action is warranted based on sound scientific information, and such action would ignore the substantial efforts underway in this watershed to address water quality issues.

Further, such a nomination would result in thousands of hours of effort expended by your staff, our Company, and the various other state and federal resource agencies, without any clear benefit, given that the purpose of Sensitive Watershed designation is to determine specific Forest Practice Rules for a given basin. Put simply, PALCO, your Board, and other agencies have already developed, or are developing, basin specific measures to restore and protect water quality in the Elk River, making pursuit of rulemaking under the Sensitive Watershed designation redundant and unnecessary.

As you know, our management in the Elk River watershed is conducted under the stringent interim protections of our Habitat Conservation Plan. The watershed conditions described in the staff report were considered during development of the stringent protection measures for the HCP. Note that Table 4 (page 17) of the staff report indicates improving conditions of the stream channel in lower Elk River since 1998. In addition, you have heard from every state and federal agency involved with these issues that they believe the HCP is providing adequate protections for the resources in this watershed, including beneficial uses such as fish. We made this commitment as a part of the Headwaters Agreement because we were assured by the state of California that they recognized the HCP measures to represent the maximum practicable mitigation for our activities and that, accordingly, additional mitigations would not be required of us.

Nonetheless, we have worked with you and your staff to implement a comprehensive set of additional actions in an attempt to address your ongoing concerns, including the following:

- **Water quality monitoring**

As you may recall, when the Board first engaged in matters in this watershed, the absence of water quality monitoring was of significant concern to the Board. Since that time, substantial

*Our forests, our future - 130 years and growing*

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monitoring is occurring and solid information data is being collected. This information will be very helpful in understanding the effects of management under the HCP as well as natural factors in the watershed. The attached map (attachment #1) illustrates the comprehensive nature of our monitoring efforts in Elk River, with 15 stations installed and operational this past winter and spring. Our efforts include THP specific monitoring, monitoring of road related sediment inputs at stream crossings, hillslope monitoring, and turbidity trends monitoring. This winter alone we processed over 2900 sediment and turbidity samples in our state of the water quality laboratory, and collected over 125,000 individual data points on water quality conditions in the Elk River. A comprehensive report on this work and its findings will be delivered to the Board next month.

- **Sediment clean up activities**

The Company continues to aggressively address sediment sources in this watershed under the requirements of the HCP. This includes a variety of activities aimed at minimizing the delivery of sediment to streams from roads and harvest areas, and extensive work to fix or mitigate legacy problems in the Elk River. We are also working with Board staff in addressing the CAO that was issued last year. We have submitted the work plan requested by WQ in the CAO, and are now beginning implementation of the work for this summer described in the work plan. The information requested has been provided, and we are jointly developing an action plan to address these matters. In addition, the Company has largely completed the work under a previous CAO, the primary result of which is new, safe drinking water supplies for a number of Elk River residents.

- **Waste discharge requirements**

Last winter the Company operated under Waste Discharge Requirements (WDRs) in Elk River as adopted by the Board. These best management practices provided an extra level of activity above the already stringent protections contained in our HCP; and they were developed cooperatively with your staff to ensure that they would be effective in restoring and protecting water quality. We also conducted a significant amount of monitoring in conjunction with the WDRs during the winter period to assess their effectiveness and to provide real time information on problems so that they could be immediately fixed.

- **TMDL process**

The TMDL process is well underway for Elk River. We have provided the staff a substantial amount of information to assist in this process (see attachment # 2). While we believe that some of the demands for information made by staff are inappropriate and have been appealed to the State Board, we continue to work cooperatively with staff with the goal of development of scientifically sound TMDLs.

In addition, the Company and the state and federal resource agencies are conducting watershed analysis in Elk River; a process which we anticipate will be completed by the end of 2003. Already an agency review copy of the analysis has been produced, and an important "Synthesis"

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meeting is being scheduled for late July or early August. This comprehensive examination of site-specific conditions in the watershed will assist both your staff and the other agencies in determining future, science-based management practices. The Elk River Watershed Analysis will represent the best information available, and we are pleased that your staff has recently indicated that they will begin working constructively with us and the other agencies in this process.

Against these many proactive efforts by PALCO, the Board, and the other agencies to develop watershed specific approaches to protecting beneficial uses within the Elk Basin, is the limited, and we think inappropriate, basis being used by your staff to recommend sensitive watershed status. This staff recommendation once again relies heavily on anecdotal information and observations that are more than five years old. It also suggests the work of the Scientific Panel convened by the Board supports such an action, although the Panel itself has indicated that its Phase I report was widely misinterpreted and expressed the desire to clarify its recommendations. No such clarification has occurred, and yet the report continues to be cited in various venues by your staff.

A few months ago, the Board directed your staff to become more engaged in the various activities that relate to water quality and work more cooperatively with the other resource agencies. This was a direction that we believe was very positive. Unfortunately, we have seen very little movement in this regard and in fact, in many ways, a worsening of the relationship. For example, non-concurrences on Timber Harvesting Plans are increasing and appear to be based primarily on policy issues, such as rate of harvest. Pursuing the sensitive watershed nomination would only exacerbate this situation and further impede our ability to move forward.

For all of these reasons, I urge the Board to reject the staff recommendation, to work cooperatively with us in implementing the many ongoing activities in the watershed and to allow future decisions to be made on the basis of sound scientific information. Thank you for your attention to this matter.

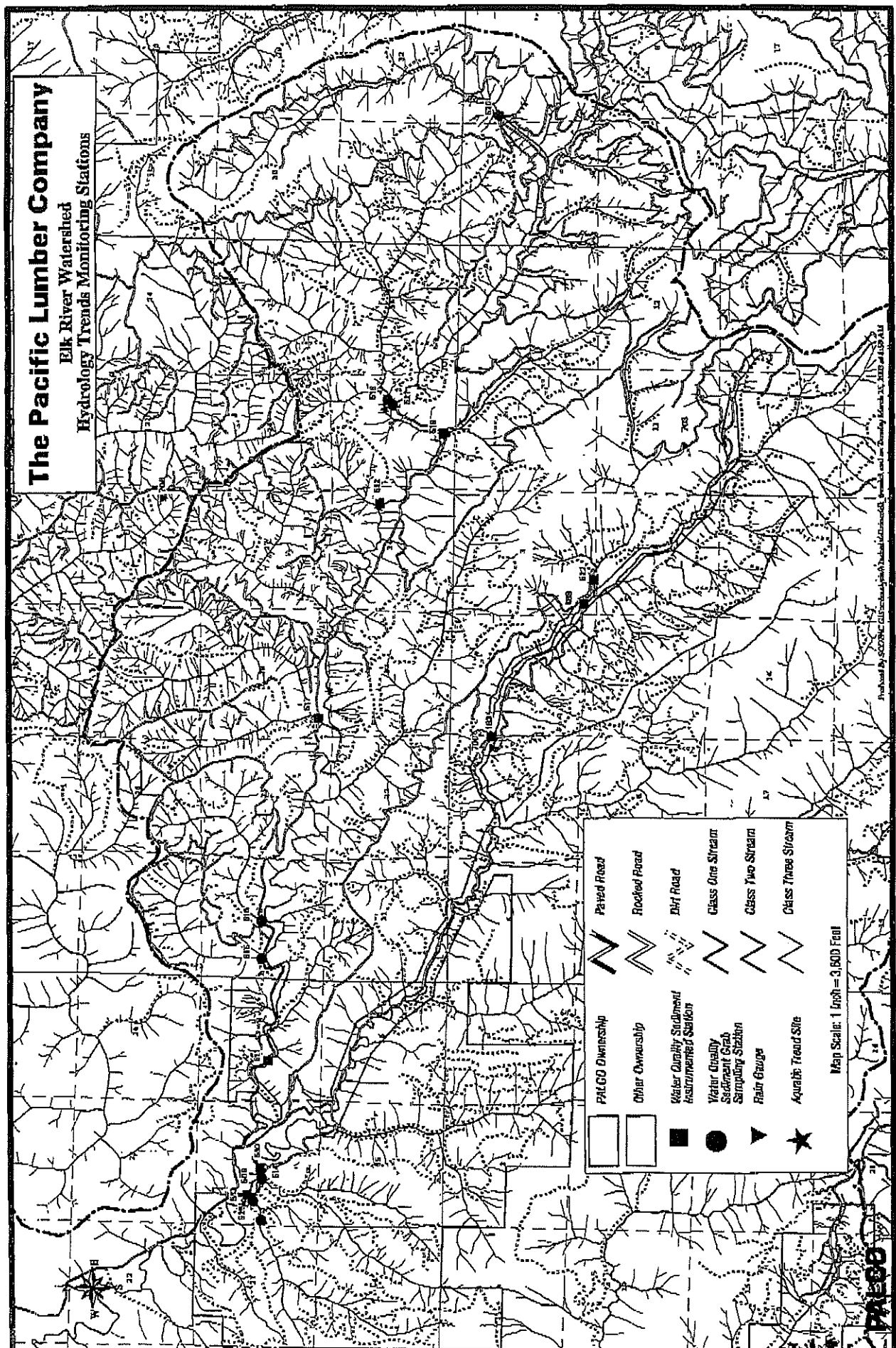
Sincerely,

THE PACIFIC LUMBER COMPANY



ROBERT E. MANNE  
President and Chief Executive Officer

REM: kw  
Attachments



**CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE  
PROTECTION**

Director's Office  
1416 9<sup>th</sup> Street  
P.O. Box 944246  
Sacramento, CA 94244-2460  
(916) 653-7772  
(916) 653-4171 Fax

Date: 6/26/03 Total Pages: 2

To: William Massey

Phone: \_\_\_\_\_

Fax: (707) 523-0135

From: Bill Snyder

Message: \_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

STATE OF CALIFORNIA—THE RESOURCES AGENCY

GRAY DAVIS, Governor

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

P.O. Box 944246  
SACRAMENTO, CA 94244-2460  
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(916) 653-7772



R1

June 27, 2003

William R. Massey, Chairman  
California Regional Water Quality Control Board  
North Coast Region  
5550 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403

Subject: Item 15-Consideration of a Sensitive Watershed Nomination to the California Board of Forestry and Fire Protection for the Elk River Watershed pursuant to Section 916.8 of the Forest Practice Rules

Dear Chairman Massey:

While the Department has been aware that a sensitive watershed nomination was being prepared by staff, we have not, prior to receiving the document on June 20, 2003, had an opportunity to review the information contained in the Water Board hearing packet. Given the complexity of the information in the document, we have not had an opportunity to evaluate the document. Consequently, we are not in a position at this time to offer comments related to the contents of the nomination information.

A decision by your Board on this staff recommendation would be premature unless affected parties, including the Department, have had an opportunity to review the nomination and provide appropriate responses. For this reason we request that no formal action be taken on this agenda item until your July Board meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrea Tuttle".

Andrea E. Tuttle  
Director

cc: Joe Blum, NOAA Fisheries  
Mark Stopher, DFG  
Trinda Bedrosian, CDG  
Stan Dixon, Chair BOF  
Amedee Brickey, USFWS

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DEPARTMENT OF CONSERVATION  
STATE OF CALIFORNIA

## FACSIMILE LEAD SHEET

CALIFORNIA  
GEOLOGICAL  
SURVEY

■ ■ ■

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■ ■ ■

GRAY DAVIS  
GOVERNORDate: 7-22-03To: Wm. Massey  
From: \_\_\_\_\_  
Subject: \_\_\_\_\_Fax #: 707) 576-2667  
Phone: 916) 445-1928Number of pages in this transmittal (including this page): 2

Comments/Notes:

Sent at the request of Trinda Pedersian  
hard copy to follow via US mail.



State of California

THE RESOURCES AGENCY OF CALIFORNIA

**M e m o r a n d u m**

To: Mr. William R. Massey, Chairman  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd., Suite A  
Santa Rosa, CA 95403

Date: July 22, 2003

From: Michael Reichle, Acting State Geologist  
Department of Conservation  
California Geological Survey  
801 K Street, 12<sup>th</sup> Floor  
Sacramento, California 95814



Subject: Elk River Sensitive Watershed Nomination

The California Geological Survey (CGS) appreciates the opportunity to comment on the North Coast Regional Water Quality Control Board's (NCRWQCB) Elk River Sensitive Watershed Nomination to be presented to the Board of Forestry and Fire Protection (BOF) pursuant to Section 916.8 of the Forest Practice Rules. This memorandum provides information regarding our initial review of the nomination and explains how we participate in the review of Sensitive Watershed Nominations, particularly the landslide, erosion and slope stability components elaborated in Section 916.8(a)4.

CGS works with the Board of Forestry in the nomination screening process outlined in Section 916.8 (c) to review all geologic evidence offered in support of the nomination. Specifically, we evaluate the quality and scientific merit of the procedures used in justifying the nomination. We also identify whether the approach used to assess geologic and slope stability conditions is transparent, reproducible, supported by sound science and meets the standards of practice for California.

Our initial review of the Draft Sensitive Watershed Nomination for the Elk River Watersheds indicates that the collection and analysis of slope stability data provided in the nomination may not be consistent with standards of practice set forth by the State Mining and Geology Board and/or the State Board for Geologists and Geophysicists. In addition, the definitions used to characterize hillslope conditions are not consistent with existing terminology.

Because of these concerns, during the nomination review process, CGS will recommend to the BOF that the NCRWQCB provide all watershed assessment information used to make the nomination for our review. This will allow us to evaluate the completeness, verifiability, repeatability, supportability and adequacy of the geologic component of the nomination. If non-standard measures or approaches were used in developing the nomination, CGS may request input from the State Mining and Geology Board and/or the State Board for Geologists and Geophysicists as to acceptability as a standard of practice for use on State and private lands in California.

If you have questions regarding these comments, feel free to contact Ms. Trinda Bedrossian at (916) 327-6977.

cc: Darryl Young, Director, Department of Conservation  
Dr. John Parrish, State Mining and Geology Board

July 24, 2003

EDGAR B. WASHBURN  
Direct (415) 617-8902  
ebwashburn@stoel.com

William R. Massey  
Chairman  
North Coast Regional Water Quality Control Board  
5550 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403-1072

**R W Q C B  
REGION 1**

**JUL 25 2003**

☐ HAL ☐ CWS ☐ FJB  
☐ NPQ ☐ DHH

**Re: Nomination of the Elk River as a Sensitive Watershed Under the California  
Forest Practice Rules**

Dear Mr. Massey:

PALCO submits this opposition to the Regional Board staff's proposal that the Regional Board seek a nomination of the Elk River as a sensitive watershed under the California Forest Practice Rules ("FPR").

In the Executive Officer's own words,

Throughout 2002 . . . Regional Water Board and staff actions have included issuance of waste discharge requirements, issuance of a cleanup and abatement order, establishment of several monitoring programs and agreements, acceleration of Total Maximum Daily Load development, and convening of the Humboldt Watersheds Independent Scientific Review Panel, *to name a few*.

June 18, 2003 Item 15 Executive Officer's Summary Report ("Executive Officer's Report") at p. 2 (emphasis added). Such intense regulation is, to PALCO's knowledge, unprecedented—and it is also unwarranted. Nevertheless, the staff would like this Board to go one step further by adopting this current Sensitive Watershed Nomination proposal. PALCO submits, however, that the staff proposal is nothing more than an unwarranted and unlawful attempt to unilaterally impose a restrictive rate, and in some places a complete moratorium, on PALCO's harvesting.

To briefly summarize, PALCO's understanding of this proposal is that the "staff approach" (as it is referred to in the Executive Officer's Summary Report) "involves dividing the landscape into three general categories" (1) Stable lands; (2) Metastable lands; and (3) Unstable lands. Executive Officer's Report at p. 6. Under this overly simplistic approach, the staff envisions no harvesting in any area classified (by whom is unclear) as Unstable lands—period. On

Oregon  
Washington  
California  
Utah  
Idaho



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Metastable lands, the staff again envisions no harvesting until a host of additional information is provided and more protective measures are added beyond those required in the comprehensive timber harvesting plan ("THP") review and approval process. As to Stable lands (where virtually not a single teaspoon of sediment could ever come within range of a watercourse), the staff concedes that the current FPR, coupled with PALCO's additional Habitat Conservation Plan prescriptions, "would be appropriate protection measures." Executive Officer's Report at p. 6. Therefore, only on Stable lands would harvesting even be allowed, and only so long as PALCO's more protective measures were applied. Ironically, under this regime, no harvesting would be permitted at all even if the operations complied entirely with, but did not go beyond, the California laws and regulations governing timber harvesting. Not only is such an approach impermissible under California law, it is a thinly-veiled attempt to shut down timber operations completely.

The staff primarily relies upon the Clean Water Act section 303(d) listing of the Elk River drainage as impaired for sediment as the purported justification for its proposal. See 6/18/03 Item 15 Staff Report ("Staff Report") at p. 8. If 303(d) listing were determinative, then virtually all locations for timber operations in the North Coast should be designated as sensitive watershed areas and, if staff's approach here is consistently applied, timber harvesting prevented. As the 303(d) list for the North Coast Region (Exhibit A attached hereto) reveals, no less than 29 watersheds in the Region would also qualify because they too have been listed as sediment impaired due to silviculture. The list itself estimates that this would affect an area of *12,069 miles within the region*. Given this vast scope, the timber industry would effectively be extinguished in the North Coast.

The only other item the staff primarily relies upon to justify the nomination are the informal meeting notes of certain state agency personnel that, in the staff's view, constitute a determination that the Elk River is "significantly cumulatively impacted." See Staff Report Appendix B. These notes, a result of what appears to be an informal meeting of agency personnel, do not necessarily reflect the findings or conclusions of the agencies themselves. Moreover, the group's notes only reflect a consensus of the attendants that there have been impacts of "varying degrees" with no explanation and no scientific support provided for this conclusion. See Staff Report Appendix B at p. 1. What follows appears to be nothing more than a stream of consciousness brainstorming session that does not constitute competent evidence of anything, and certainly does not affirmatively establish the conditions in the area. Such a determination would have to be made consistent with the requirements of the Administrative Procedure Act to be given legal effect, or provide the basis for the Regional Board actions restricting the use of private property as the staff proposes here.



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As for the staff's purported data results, the majority of the information is derived from studies and reports prepared by PALCO which, needless to say, lead to different conclusions depending on who is interpreting the data. For example, under the heading "Accelerated Rates of Proposed Road Construction or Timber Harvesting Within the Watershed," the staff has included in its table a "Total proposed and constructed roads since 2000" figure of 9.33 miles. Contrary to the misleading insinuation of an "Accelerated Rate," the data actually shows a decrease in road construction after 1997, compared to the preceding 10 years. See Staff Report at p. 19.

Moreover, "proposed roads" are not necessarily constructed, making the comparison inappropriate. PALCO has documented time and again to this Board the improving conditions in the Elk River Watershed. If the Board intends to entertain its staff's nomination proposal, then PALCO requests that the entire administrative records for each matter that the Regional Board has pursued against PALCO with respect to the Elk River Watershed also be included in its record in this matter. PALCO will demonstrate to the Board of Forestry the faulty analysis of this entire nomination proposal, and will make such demonstration based in large part on the materials already in the Regional Board's possession.

Finally, PALCO wishes to raise two important considerations at this early stage. First, the Regional Board staff's unique singling out of PALCO is a violation of equal protection under the law. A sampling of the actions already taken against PALCO includes (but is not limited to) the following:

- (1) Cleanup and Abatement Order No. 97-115 that was petitioned for review but eventually superseded;
- (2) Cleanup and Abatement Order No. 98-100 that was petitioned for review but an agreement was entered into between PALCO and the Regional Board;
- (3) Monitoring and Reporting Program Order No R1-2001-19 that the State Board ordered vacated;
- (4) Cleanup and Abatement Order and Request for Technical Reports Order No. R1-2002-0085 (currently pending review before the State Board);
- (5) August 5, 2002 Letter Order Requiring Reports of Waste Discharge for Elk River (currently pending review before the State Board);
- (6) Order No R1-2002-0088 Requiring Technical Information, Monitoring and Reporting Program for the Elk River (currently pending review before the State Board);



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- (7) Waste Discharge Requirements Order No. R1-2002-0105 (rescinded by Order No. R1-2003-0007);
- (8) Monitoring and Reporting Program associated with Order No. R1-2002-0105 for Elk River (rescinded by Order No. R1-2003-0007);
- (9) R1-2002-0114 Modification of Cleanup and Abatement Order and Request for Technical Reports Order No. R1-2002-0085 (currently pending review before the State Board);
- (10) December 19, 2002 Letter Order Requiring Reports of Waste Discharge for Freshwater Creek (currently pending review before the State Board);
- (11) January 6, 2003 Section 13267 Order for Freshwater Cleanup and Abatement Activities that PALCO is complying with;
- (12) Monitoring and Reporting Program Order No. R1-2003-0007 that PALCO is complying with;
- (13) Waste Discharge Requirements Order No. R1-2003-0027 for Freshwater Creek that PALCO is complying with;
- (14) Monitoring and Reporting Program Order No. R1-2003-0027 for Freshwater Creek that PALCO is complying with;
- (15) A Data and Map Request purportedly for TMDL development; and
- (16) A GIS Request purportedly for TMDL development.

The preceding list does not include the numerous informal requests that PALCO has endeavored to fulfill at the Regional Board's behest. Additionally, the State Board has issued WQO-2001-0014 that was subsequently vacated pursuant to litigation in Humboldt County Superior Court. The State Board has also issued WQO-2002-0004 and WQO-2002-0019 pursuant to petitions that were directed at forcing the Regional Board to take yet more actions against PALCO. Moreover, PALCO is constantly fulfilling its administrative requirements with the California Department of Forestry and Fire Protection ("CDF") pursuant to the comprehensive framework for the regulation of timber harvesting and its water quality impacts established by the Forest Practice Act and FPR. What is often lost in the swarm of administrative activity is that much of these actions are a result of PALCO's voluntary assumption of additional protective measures that exceed those required under California law. Attempting now to foist even further



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restrictions on PALCO with no valid scientific justification, either substantively or procedurally, is a violation of PALCO's right to equal protection under the law.

Second, the staff's proposal for extensive prohibitions on harvesting would also constitute an uncompensated taking in violation of the United States and California Constitutions. PALCO's lands are zoned exclusively as Timberland Production Zones. The only use permitted on such lands is timber harvesting. Accordingly, the staff's proposal to unilaterally prevent PALCO from harvesting a large amount of its lands is an impermissible taking.

In conclusion, PALCO requests that the Regional Board reject the proposal of the staff to seek nomination of the Elk River Watershed before the Board of Forestry. As documented above, as documented in the Executive Officer's Report, and as documented in the staff's own report, the Regional Board has already visited an unprecedented and unwarranted amount of attention and regulation on PALCO and on the watershed. Seeking the nomination proposed here would be gratuitous, unjustified, and ultimately unlawful.

Very truly yours,

Edgar B. Washburn

EBW:clb

cc: Catherine Kuhlman, Executive Officer, NCRWQCB

# EXHIBIT A

**EXHIBIT A**



STATE WATER RESOURCES CONTROL BOARD  
RESOLUTION NO. 2003 - 0009

APPROVAL OF THE 2002 FEDERAL CLEAN  
WATER ACT SECTION 303(d) LIST OF WATER  
QUALITY LIMITED SEGMENTS

WHEREAS:

1. Section 303(d) of the federal Clean Water Act (CWA) requires the State to identify surface waters that do not meet applicable water quality standards with certain technology-based controls.
2. The list of waters identified under CWA section 303(d) must also include a description of the pollutants causing impairment and a priority ranking of the waters for purposes of development of Total Maximum Daily Loads (TMDLs).
3. The Regional Water Quality Control Boards (RWQCBs) have made recommendations to add, remove, and change the list of water body pollutant combinations on the 1998 CWA section 303(d) list.
4. The State Water Resources Control Board (SWRCB) held three days of hearings on the proposed changes.
5. SWRCB has received many comments on the proposed 2002 CWA section 303(d) list, responded to all comments received, and has made several changes in response to the comments.
6. In developing the 2002 CWA section 303(d) list, SWRCB has considered all readily available data and information.

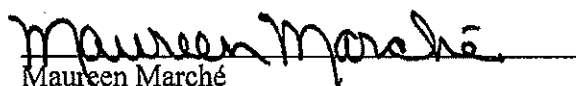
THEREFORE BE IT RESOLVED THAT:

SWRCB:

1. Approves the 2002 CWA section 303(d) list of water quality limited segments (attached).
2. Authorizes the Executive Director to transmit the 2002 CWA section 303(d) list of water quality limited segments and other supporting information to the U.S. Environmental Protection Agency for approval.

CERTIFICATION

The undersigned, Clerk to the Board, does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the State Water Resources Control Board held on February 4, 2003.

  
Maureen Marché  
Clerk to the Board



# 2002 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENT

Approved by SWRCB:  
February 4, 2003

REGION	TYPE	NAME	CALWATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Albion River, Mendocino Coast HU, Albion River HA	11340013	Sedimentation/Siltation	Silviculture Logging Road Construction/Maintenance Nonpoint Source	High	77 Miles	2003
1	R	Americano Creek, Bodega HU, Estero Americano HA	11530012	Nutrients	Pasture Grazing-Riparian and/or Upland Range Grazing-Riparian Range Grazing-Upland Intensive Animal Feeding Operations Manure Lagoons Dairies	Low	38 Miles	
1	R	Big River, Mendocino Coast HU, Big River HA	11330043	Sedimentation/Siltation	Silviculture Logging Road Construction/Maintenance Road Construction Disturbed Sites (Land Develop.) Nonpoint Source	High	225 Miles	2003
1	R	Eel River Delta, Eel River HU, Lower Eel River HA	11111032	Temperature	Habitat Modification Removal of Riparian Vegetation Streambank Modification/Destabilization Drainage/Filling Of Wetlands Erosion/Siltation Nonpoint Source	Low	225 Miles	
1	R			Temperature	Range Grazing-Riparian and/or Upland Silviculture Nonpoint Source Removal of Riparian Vegetation Nonpoint Source	Medium	426 Miles	

# 2002 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENT

Approved by SWRCB:  
February 4, 2003

REGION TYPE	NAME	CALWATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 R	Eel River, Middle Fork, Eel River HU, Middle Fork HA	11171045	Sedimentation/Siltation  Temperature	Erosion/Siltation  Removal of Riparian Vegetation Nonpoint Source	Medium  Medium	1071 Miles  1071 Miles	
1 R	Eel River, Middle Main Fork, Eel River HU, Middle Main HA	11141061	Sedimentation/Siltation	Range Grazing-Riparian Range Grazing-Upland Silviculture Harvesting, Restoration, Residue Management Logging Road Construction/Maintenance Construction/Land Development Land Development Hydromodification Habitat Modification Removal of Riparian Vegetation Streambank Modification/Destabilization Erosion/Siltation	Medium	674 Miles	
1 R	Eel River, North Fork, Eel River HU, North Fork HA	11150065	Sedimentation/Siltation  Temperature	Upstream Impoundment Habitat Modification Removal of Riparian Vegetation Streambank Modification/Destabilization Drainage/Filling Of Wetlands Channel Erosion Erosion/Siltation	Medium	674 Miles	
1 R	Eel River, North Fork, Eel River HU, North Fork HA	11150065	Sedimentation/Siltation	Silviculture Logging Road Construction/Maintenance Erosion/Siltation Nonpoint Source	Medium	382 Miles	

# 2002 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENT

Approved by SWRCB:  
February 4, 2003

REGION TYPE	NAME	CAL.WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Eel River, South Fork, Eel River HU, South Fork HA	11131030	<p>Temperature</p> <p>Habitat Modification</p> <p>Removal of Riparian Vegetation</p> <p>Streambank Modification/Destabilization</p> <p>Nonpoint Source</p>	Medium	382 Miles	
1	R	Eel River, South Fork, Eel River HU, South Fork HA	11131030	<p>Sedimentation/Siltation</p> <p>Range Grazing-Riparian and/or Upland Silviculture</p> <p>Logging Road Construction/Maintenance</p> <p>Resource Extraction</p> <p>Hydromodification</p> <p>Flow Regulation/Modification</p> <p>Removal of Riparian Vegetation</p> <p>Erosion/Siltation</p> <p>Nonpoint Source</p>	Medium	943 Miles	
1	R	Eel River, Upper Main HA (Includes Tomki Creek)	11163050	<p>Temperature</p> <p>Hydromodification</p> <p>Flow Regulation/Modification</p> <p>Removal of Riparian Vegetation</p> <p>Erosion/Siltation</p> <p>Nonpoint Source</p>	Medium	943 Miles	
1	R	Eel River, Upper Main HA (Includes Tomki Creek)	11163050	<p>Sedimentation/Siltation</p> <p>Agriculture-grazing Silviculture</p> <p>Harvesting, Restoration, Residue Management</p> <p>Logging Road Construction/Maintenance</p> <p>Silvicultural Point Sources</p> <p>Construction/Land Development</p> <p>Highway/Road/Bridge Construction</p> <p>Removal of Riparian Vegetation</p> <p>Streambank Modification/Destabilization</p> <p>Erosion/Siltation</p>	Medium	1141 Miles	



# 2002 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENT

Approved by SWRCB:  
February 4, 2003

REGION TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
Temperature							
				Channelization	Medium	1141 Miles	
				Habitat Modification			
				Removal of Riparian Vegetation			
				Streambank Modification/Destabilization			
				Drainage/Filling Of Wetlands			
				Nonpoint Source			
1	R	Elk River, Eureka Plain HU	11000042		High	88 Miles	2003
				Sedimentation/Siltation			
				Sliviculture			
				Harvesting, Restoration, Residue Management			
				Logging Road Construction/Maintenance			
				Removal of Riparian Vegetation			
				Streambank Modification/Destabilization			
				Erosion/Siltation			
				Natural Sources			
				Nonpoint Source			
1	E	Estero Americano, Bodega HU, Estero Americano HA	11530012		Medium	199 Acres	
				Nutrients			
				Pasture Grazing-Riparian and/or Upland			
				Manure Lagoons	Low	199 Acres	
				Sedimentation/Siltation			
				Range Grazing-Riparian			
				Hydromodification			
				Removal of Riparian Vegetation			
				Streambank Modification/Destabilization			
				Erosion/Siltation			
				Nonpoint Source			
1	R	Freshwater Creek, Eureka Plain HU	11000050		High	84 Miles	2003
				Sedimentation/Siltation			
				Sliviculture			
				Harvesting, Restoration, Residue Management			
				Logging Road Construction/Maintenance			
				Removal of Riparian Vegetation			
				Streambank Modification/Destabilization			
				Erosion/Siltation			
				Natural Sources			
				Nonpoint Source			

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Approved by SWRCB:  
February 4, 2003

REGION TYPE	NAME	CAL.WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 R	Garcia River, Mendocino Coast HU	11370026	Temperature	Habitat Modification Removal of Riparian Vegetation Streambank Modification/Destabilization Nonpoint Source	High	154 Miles	2002
1 R	Gualala River, Mendocino Coast HU, Gualala River HA	11385021	Sedimentation/Siltation	Specialty Crop Production Silviculture Harvesting, Restoration, Residue Management Logging Road Construction/Maintenance Highway/Road/Bridge Construction Land Development Disturbed Sites (Land Develop.) Erosion/Siltation Nonpoint Source	High	455 Miles	2004
			Temperature	Removal of Riparian Vegetation Streambank Modification/Destabilization Channel Erosion Erosion/Siltation Nonpoint Source	Low	455 Miles	

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REGION TYPE	NAME	CALWATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 R	Jacoby Creek, Eureka Plain HU	11000013	Sediment	Silviculture Road Construction Land Development Disturbed Sites (Land Develop.) Urban Runoff/Storm Sewers Hydromodification Channelization Removal of Riparian Vegetation Streambank Modification/Destabilization Drainage/Filling Of Wetlands Channel Erosion Erosion/Siltation Sediment Resuspension Natural Sources Nonpoint Source	Low	19 Miles	
1 R	Klamath River, Klamath River HU, Butte Valley HA	10581023	Nutrients  Temperature	Nonpoint Source  Nonpoint Source	Medium  Medium	265 Miles  265 Miles	
1 R	Klamath River, Klamath River HU, Lost River HA, Clear Lake, Boles HSAs	10593011	Nutrients  Temperature	Hydromodification Nonpoint Source  Hydromodification Dam Construction Upstream Impoundment Flow Regulation/Modification Water Diversions Agricultural Water Diversion Nonpoint Source	Medium  Medium	601 Miles  601 Miles	

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REGION	TYPE	NAME	CALIF. WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Klamath River, Klamath River HU, Lost River HA, Tule Lake and Mt Dome HSAs	10591063	Nutrients	Agriculture Specialty Crop Production Agriculture-subsurface drainage Agriculture-irrigation tailwater Agricultural Return Flows Water Diversions Agricultural Water Diversion Habitat Modification Removal of Riparian Vegetation Drainage/Filling Of Wetlands Natural Sources Nonpoint Source	Medium	612 Miles	
				Temperature	Hydromodification Channelization Flow Regulation/Modification Water Diversions Agricultural Water Diversion Habitat Modification Removal of Riparian Vegetation Drainage/Filling Of Wetlands Nonpoint Source	Medium	612 Miles	

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REGION	TYPE	NAME	CALIFORNIA WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Klamath River, Klamath River HU, Lower HA, Klamath Glen HSA	10511086	Nutrients				
					Industrial Point Sources	Medium	609 Miles	
					Major Industrial Point Source			
					Minor Industrial Point Source			
					Municipal Point Sources			
					Major Municipal Point Source-dry and/or wet weather discharge			
					Minor Municipal Point Source-dry and/or wet weather discharge			
					Agriculture			
					Irrigated Crop Production			
					Specialty Crop Production			
					Pasture Grazing-Riparian and/or Upland			
					Range Grazing-Riparian			
					Intensive Animal Feeding Operations			
					Agriculture-storm runoff			
					Agriculture-subsurface drainage			
					Agriculture-irrigation tailwater			
				Organic Enrichment/Low Dissolved Oxygen		Medium	609 Miles	
					Industrial Point Sources			
					Municipal Point Sources			
					Agriculture			
					Irrigated Crop Production			
					Specialty Crop Production			
					Range Grazing-Riparian			
					Agriculture-storm runoff			
					Agriculture-subsurface drainage			
					Agriculture-irrigation tailwater			
					Agriculture-animal			
					Upstream Impoundment			
					Flow Regulation/Modification			
					Out-of-state source			



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REGION	TYPE	NAME	GALWATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Klamath River, Klamath River HU, Middle HA, Iron Gate Dam to Scott River	10535053	Temperature	Hydromodification Dam Construction Upstream Impoundment Flow Regulation/Modification Water Diversions Habitat Modification Removal of Riparian Vegetation Channel Erosion	Medium	609 Miles	
				Nutrients	Out-of-state source Nonpoint/Point Source	Medium	548 Miles	
				Organic Enrichment/Low Dissolved Oxygen	Out-of-state source Nonpoint/Point Source	Medium	548 Miles	
				Temperature	Hydromodification Upstream Impoundment Flow Regulation/Modification Habitat Modification Removal of Riparian Vegetation Nonpoint Source	Medium	548 Miles	
				Nutrients	Industrial Point Sources Municipal Point Sources Agriculture Specialty Crop Production Agricultural Return Flows Internal Nutrient Cycling (primarily lakes) Natural Sources Nonpoint Source	Medium	129 Miles	

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REGION	TYPE	NAME	CALIF. WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
Organic Enrichment/Low Dissolved Oxygen								
Medium								
129 Miles								
Industrial Point Sources								
Municipal Point Sources								
Agriculture								
Irrigated Crop Production								
Specialty Crop Production								
Range Grazing-Riparian and/or Upland								
Agriculture-storm runoff								
Agriculture-subsurface drainage								
Agriculture-irrigation tailwater								
Agriculture-animal								
Upstream Impoundment								
Flow Regulation/Modification								
Out-of-state source								
Medium								
129 Miles								
Temperature								
Hydromodification								
Upstream Impoundment								
Flow Regulation/Modification								
Nonpoint Source								
Nutrients								
Industrial Point Sources								
Municipal Point Sources								
Agriculture								
Agriculture-storm runoff								
Agriculture-irrigation tailwater								
Wastewater - land disposal								
Upstream Impoundment								
Natural Sources								
Nonpoint Source								
Out-of-state source								
Medium								
1389 Miles								

1 R Klamath River, Klamath River HU, Middle  
HA, Scott River to Trinity River 10512050

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REGION	TYPE	NAME	CAL WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
				Organic Enrichment/Low Dissolved Oxygen	Industrial Point Sources Municipal Point Sources Combined Sewer Overflow Agriculture Agriculture-storm runoff Agriculture-irrigation tailwater Upstream Impoundment Flow Regulation/Modification Out-of-state source	Medium	1389 Miles	
				Temperature	Hydromodification Channelization Dam Construction Upstream Impoundment Flow Regulation/Modification Water Diversions Habitat Modification Removal of Riparian Vegetation Streambank Modification/Destabilization Drainage/Filling Of Wetlands Natural Sources Nonpoint Source	Medium	1389 Miles	
	I	R	Klamath River, Klamath River HU, Salmon River HA	10521034	Nutrients	High	871 Miles	2004
					Unknown Nonpoint Source			
					Temperature	High	871 Miles	2004
					Removal of Riparian Vegetation Unknown Nonpoint Source			
	I	R	Laguna de Santa Rosa, Russian River HU, Middle Russian River HA	11421020	Low Dissolved Oxygen	Low	96 Miles	
					Internal Nutrient Cycling (primarily lakes) Nonpoint Source Point Source			

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REGION TYPE	NAME	CAL WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Mad River, Mad River HU	10910011	Sedimentation/Siltation	Medium	96 Miles	
				Entire Russian River watershed (including Laguna de Santa Rosa) is listed for sedimentation.			
				Road Construction			
				Land Development			
				Disturbed Sites (Land Develop.)			
				Urban Runoff/Storm Sewers			
				Other Urban Runoff			
				Highway/Road/Bridge Runoff			
				Hydromodification			
				Channelization			
				Removal of Riparian Vegetation			
				Streambank Modification/Destabilization			
				Drainage/Filling Of Wetlands			
				Channel Erosion			
Erosion/Siltation							
Erosion From Derelict Land							
Highway Maintenance and Runoff							
Nonpoint Source							
1	L	Lake Pillsbury (Eel River HU, Upper Main HA, Lake Pillsbury HSA)	11163051	Temperature	Low	96 Miles	
				Entire Russian River watershed (including Laguna de Santa Rosa) is listed for temperature.			
				Hydromodification			
				Upstream Impoundment			
				Removal of Riparian Vegetation			
				Streambank Modification/Destabilization			
				Nonpoint Source			
				Low		1973 Acres	
				Mercury			
				Natural Sources			
				Sedimentation/Siltation			
				Silviculture			
				Resource Extraction			
				Nonpoint Source			
Low		654 Miles					

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REGION TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
I R	Mattole River, Cape Mendocino HU, Mattole River HA	11230072	Temperature	Upstream Impoundment	Low	654 Miles	
				Flow Regulation/Modification			
				Habitat Modification			
				Removal of Riparian Vegetation			
				Nonpoint Source			
				Unknown Nonpoint Source			
I R	Mattole River, Cape Mendocino HU, Mattole River HA	11230072	Sedimentation/Siltation	Silviculture	High	503 Miles	2004
				Resource Extraction			
				Nonpoint Source			
I L	Mendocino, Lake	11432060	Temperature	Specialty Crop Production	High	503 Miles	2004
				Range Grazing-Riparian and/or Upland			
				Range Grazing-Riparian			
				Silviculture			
				Road Construction			
				Habitat Modification			
				Removal of Riparian Vegetation			
				Natural Sources			
I L	Mendocino, Lake	11432060	Mercury	Range Grazing-Riparian and/or Upland	Low	1704 Acres	
				Silviculture			
				Road Construction			
				Habitat Modification			
				Removal of Riparian Vegetation			
				Natural Sources			
I L	Mendocino, Lake	11432060	Mercury	Resource Extraction	Low	1704 Acres	
				Nonpoint Source			

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REGION TYPE	NAME	CAL. WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 E	Navarro River Delta, Mendocino Coast HU, Navarro River HA	1135007	Sedimentation/Siltation	Erosion/Siltation	High	48 Acres	2004
1 R	Navarro River, Mendocino Coast HU	1135007	Sedimentation/Siltation	<ul style="list-style-type: none"> <li>Agriculture</li> <li>Nonirrigated Crop Production</li> <li>Irrigated Crop Production</li> <li>Specialty Crop Production</li> <li>Range Grazing-Riparian and/or Upland</li> <li>Range Grazing-Riparian</li> <li>Range Grazing-Upland</li> <li>Agriculture-grazing</li> <li>Silviculture</li> <li>Harvesting, Restoration, Residue Management</li> <li>Logging Road Construction/Maintenance</li> <li>Silvicultural Point Sources</li> <li>Construction/Land Development</li> <li>Highway/Road/Bridge Construction</li> <li>Land Development</li> <li>Disturbed Sites (Land Develop.)</li> <li>Resource Extraction</li> <li>Flow Regulation/Modification</li> <li>Water Diversions</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Drainage/Filling Of Wetlands</li> <li>Channel Erosion</li> <li>Erosion/Siltation</li> <li>Nonpoint Source</li> </ul>	High	415 Miles	2004



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REGION TYPE	NAME	CALWATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Noyo River, Mendocino Coast HU, Noyo River HA	11320010	<p>Sedimentation/Siltation</p> <p>Silviculture</p> <p>Nonpoint Source</p>	High	144 Miles	2003
1	R	Redwood Creek, Redwood Creek HU	10710020	<p>Sedimentation/Siltation</p> <p>Range Grazing-Riparian Silviculture</p> <p>Harvesting, Restoration, Residue Management</p> <p>Logging Road Construction/Maintenance</p> <p>Construction/Land Development</p> <p>Disturbed Sites (Land Develop.)</p> <p>Removal of Riparian Vegetation</p> <p>Streambank Modification/Destabilization</p> <p>Erosion/Siltation</p> <p>Natural Sources</p> <p>Logging Road Construction/Maintenance</p> <p>Removal of Riparian Vegetation</p> <p>Streambank Modification/Destabilization</p> <p>Erosion/Siltation</p> <p>Natural Sources</p> <p>Nonpoint Source</p>	Medium	332 Miles	2004

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REGION	TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Russian River, Russian River HU, Lower Russian River H.A. Austin Creek HSA	11412013	Sedimentation/Siltation	Silviculture Construction/Land Development Disturbed Sites (Land Develop.) Dam Construction Flow Regulation/Modification Erosion/Siltation	Medium	81 Miles	
				Temperature	Hydromodification Flow Regulation/Modification Habitat Modification Removal of Riparian Vegetation Nonpoint Source	Low	81 Miles	
1	R	Russian River, Russian River HU, Lower Russian River H.A. Guerneville HSA	11411041	Pathogens		Low	195 Miles	

*Listing covers only the Monte Rio area of this watershed from the confluence of Dutch Bill Creek to the confluence of Fife Creek and Healdsburg Memorial Beach from the Hwy 101 crossing to the railroad crossing upstream of the Beach.*

Nonpoint/Point Source



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I	R	Russian River, Russian River HU, Middle Russian River HA, Big Sulphur Creek HSA	11426023	Sedimentation/Siltation	Medium	195 Miles	
				Temperature	Low	195 Miles	
				Sedimentation/Siltation	Medium	85 Miles	
				Temperature	Low	85 Miles	
				Sedimentation/Siltation	Medium	85 Miles	
				Temperature	Low	85 Miles	

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REGION	TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Russian River, Russian River HU, Middle Russian River H.A. Dry Creek HSA	11424034	Sedimentation/Siltation	<ul style="list-style-type: none"> <li>Agriculture</li> <li>Agriculture-storm runoff</li> <li>Silviculture</li> <li>Logging Road Construction/Maintenance</li> <li>Construction/Land Development</li> <li>Highway/Road/Bridge Construction</li> <li>Disturbed Sites (Land Develop.)</li> <li>Hydromodification</li> <li>Channelization</li> <li>Dam Construction</li> <li>Upstream Impoundment</li> <li>Flow Regulation/Modification</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Drainage/Filling Of Wetlands</li> <li>Channel Erosion</li> <li>Erosion/Siltation</li> <li>Nonpoint Source</li> </ul>	Medium	255 Miles	
		Temperature			<ul style="list-style-type: none"> <li>Hydromodification</li> <li>Upstream Impoundment</li> <li>Flow Regulation/Modification</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Nonpoint Source</li> </ul>	Low	255 Miles	

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REGION TYPE	NAME	CALWATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 R	Russian River, Russian River HU, Middle Russian River H.A. Geyserville HSA	11425032	Sedimentation/Siltation	<ul style="list-style-type: none"> <li>Agriculture</li> <li>Nonirrigated Crop Production</li> <li>Irrigated Crop Production</li> <li>Specialty Crop Production</li> <li>Range Grazing-Riparian</li> <li>Range Grazing-Upland</li> <li>Agriculture-storm runoff</li> <li>Agriculture-grazing</li> <li>Silviculture</li> <li>Construction/Land Development</li> <li>Geothermal Development</li> <li>Disturbed Sites (Land Develop.)</li> <li>Surface Runoff</li> <li>Resource Extraction</li> <li>Channelization</li> <li>Bridge Construction</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Drainage/Filling Of Wetlands</li> <li>Channel Erosion</li> <li>Erosion/Siltation</li> <li>Natural Sources</li> <li>Nonpoint Source</li> <li>Flow Regulation/Modification</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Nonpoint Source</li> </ul>	Medium	243 Miles	
	Temperature				Low	243 Miles	

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REGION TYPE	NAME	CALWATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 R	Russian River, Russian River HU, Middle Russian River H.A, Mark West Creek HSA	11423021	Sedimentation/Siltation	<ul style="list-style-type: none"> <li>Agriculture</li> <li>Irrigated Crop Production</li> <li>Specialty Crop Production</li> <li>Range Grazing-Riparian and/or Upland</li> <li>Range Grazing-Riparian</li> <li>Intensive Animal Feeding Operations</li> <li>Agriculture-storm runoff</li> <li>Agriculture-grazing</li> <li>Silviculture</li> <li>Harvesting, Restoration, Residue Management</li> <li>Construction/Land Development</li> <li>Highway/Road/Bridge Construction</li> <li>Land Development</li> <li>Disturbed Sites (Land Develop.)</li> <li>Other Urban Runoff</li> <li>Surface Runoff</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Drainage/Filling Of Wetlands</li> <li>Channel Erosion</li> <li>Erosion/Siltation</li> </ul>	Medium	99 Miles	
	Temperature			<ul style="list-style-type: none"> <li>Hydromodification</li> <li>Upstream Impoundment</li> <li>Flow Regulation/Modification</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Nonpoint Source</li> </ul>	Low	99 Miles	



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REGION TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 R	Russian River, Russian River HU, Upper Russian River H.A, Coyote Valley HSA	11432060	Sedimentation/Siltation	<ul style="list-style-type: none"> <li>Agriculture</li> <li>Silviculture</li> <li>Construction/Land Development</li> <li>Hydromodification</li> <li>Channelization</li> <li>Dam Construction</li> <li>Flow Regulation/Modification</li> <li>Bridge Construction</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Drainage/Filling Of Wetlands</li> <li>Channel Erosion</li> <li>Erosion/Siltation</li> </ul>	Medium	171 Miles	
			Temperature	<ul style="list-style-type: none"> <li>Hydromodification</li> <li>Upstream Impoundment</li> <li>Flow Regulation/Modification</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Nonpoint Source</li> </ul>	Low	171 Miles	
1 R	Russian River, Russian River HU, Upper Russian River H.A, Forsythe Creek HSA	11433040	Sedimentation/Siltation	<ul style="list-style-type: none"> <li>Erosion/Siltation</li> <li>Nonpoint Source</li> </ul>	Medium	122 Miles	
			Temperature	<ul style="list-style-type: none"> <li>Hydromodification</li> <li>Upstream Impoundment</li> <li>Flow Regulation/Modification</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Nonpoint Source</li> </ul>	Low	122 Miles	

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REGION TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 R	Russian River, Russian River HU, Upper Russian River H.A. Ukiah HSA	11431071	Sedimentation/Siltation	<ul style="list-style-type: none"> <li>Agriculture</li> <li>Silviculture</li> <li>Construction/Land Development</li> <li>Resource Extraction</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Drainage/Filling Of Wetlands</li> <li>Channel Erosion</li> <li>Erosion/Siltation</li> <li>Highway Maintenance and Runoff</li> <li>Natural Sources</li> </ul>	Medium	460 Miles	
			Temperature	<ul style="list-style-type: none"> <li>Hydromodification</li> <li>Upstream Impoundment</li> <li>Flow Regulation/Modification</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Nonpoint Source</li> </ul>	Low	460 Miles	
1 R	Santa Rosa Creek, Russian River HU, Middle Russian River HA	11422013	Pathogens	<ul style="list-style-type: none"> <li>Nonpoint Source</li> <li>Point Source</li> </ul>	Low	87 Miles	

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Sedimentation/Siltation							
Entire Russian River watershed (including Santa Rosa Creek) is listed for sedimentation.							
Medium							
87 Miles							
Agriculture							
Nonirrigated Crop Production							
Irrigated Crop Production							
Specialty Crop Production							
Pasture Grazing-Riparian and/or Upland							
Range Grazing-Riparian							
Range Grazing-Upland							
Dairies							
Construction/Land Development							
Highway/Road/Bridge Construction							
Land Development							
Urban Runoff/Storm Sewers							
Urban Runoff-Non-industrial Permitted							
Other Urban Runoff							
Surface Runoff							
Hydromodification							
Channelization							
Bridge Construction							
Habitat Modification							
Removal of Riparian Vegetation							
Streambank Modification/Destabilization							
Drainage/Filling Of Wetlands							
Channel Erosion							
Erosion/Siltation							
Natural Sources							
Nonpoint Source							
Temperature							
Entire Russian River watershed (including Santa Rosa Creek) is listed for temperature.							
Low							
87 Miles							
Hydromodification							
Upstream Impoundment							
Removal of Riparian Vegetation							
Streambank Modification/Destabilization							
Nonpoint Source							

# 2002 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENT

Approved by SHRCB:  
February 4, 2003

REGION	TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1	R	Scott River, Klamath River HU, Scott River HA	10541035	Sedimentation/Siltation	Irrigated Crop Production Pasture Grazing-Riparian and/or Upland Silviculture Resource Extraction Mill Tailings Natural Sources Nonpoint Source	Medium	902 Miles	
				Temperature	Irrigated Crop Production Pasture Grazing-Riparian and/or Upland Agricultural Return Flows Silviculture Flow Regulation/Modification Water Diversions Habitat Modification Removal of Riparian Vegetation Streambank Modification/Destabilization Drainage/Filling Of Wetlands Other Nonpoint Source	Medium	902 Miles	
1	R	Shasta River, Klamath River HU, Shasta River HA	10550001	Organic Enrichment/Low Dissolved Oxygen	Minor Municipal Point Source-dry and/or wet weather discharge Agriculture-storm runoff Agriculture-irrigation tailwater Dairies Hydromodification Dam Construction Flow Regulation/Modification Habitat Modification	Medium	630 Miles	
				Temperature	Agriculture-irrigation tailwater Flow Regulation/Modification Habitat Modification Removal of Riparian Vegetation Drainage/Filling Of Wetlands	Medium	630 Miles	



# 2002 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENT

Approved by SWRCB:  
February 4, 2003

REGION TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 L	Sonoma, Lake	11424030	Mercury	Resource Extraction Nonpoint Source	Low	2377 Acres	
1 R	Stemple Creek/Estero do San Antonio, Bodega HU, Estero de San Antonio HA	11540010	Nutrients <i>This pollutant was relisted for this water body by USEPA in 1998.</i>	Agriculture Irrigated Crop Production Pasture Grazing-Riparian and/or Upland Range Grazing-Riparian Intensive Animal Feeding Operations Concentrated Animal Feeding Operations (permitted, point source) Agriculture-storm runoff Land Development Hydromodification Channelization Removal of Riparian Vegetation Streambank Modification/Destabilization Drainage/Filling Of Wetlands Channel Erosion Natural Sources	Medium	61 Miles	
			Sediment	Agriculture Grazing-Related Sources Land Development Erosion/Siltation Nonpoint Source	Low	61 Miles	
1 R	Ten Mile River, Mendocino Coast HU, Rockport HA, Ten Mile River HSA	11313045	Sedimentation/Siltation	Silviculture Harvesting, Restoration, Residue Management Logging Road Construction/Maintenance	High	162 Miles	2003

# 2002 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENT

Approved by SWRCB:  
February 4, 2003

REGION TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
I	R	Trinity River, East Fork, Trinity River HU, Upper HA	10640030	<p>Temperature</p> <p>Habitat Modification</p> <p>Removal of Riparian Vegetation</p> <p>Streambank Modification/Destabilization</p> <p>Nonpoint Source</p>	Low	162 Miles	
I	R	Trinity River, East Fork, Trinity River HU, Upper HA	10640030	<p>Sedimentation/Siltation</p> <p>Silviculture</p> <p>Harvesting, Restoration, Residue Management</p> <p>Logging Road Construction/Maintenance</p> <p>Resource Extraction</p> <p>Surface Mining</p> <p>Placer Mining</p> <p>Mine Tailings</p> <p>Hydromodification</p> <p>Dam Construction</p> <p>Flow Regulation/Modification</p> <p>Habitat Modification</p> <p>Removal of Riparian Vegetation</p> <p>Streambank Modification/Destabilization</p> <p>Channel Erosion</p> <p>Erosion/Siltation</p> <p>Natural Sources</p> <p>Nonpoint Source</p>	Medium	92 Miles	
I	R	Trinity River, South Fork, Trinity River HU, South Fork HA	10621035	<p>Sedimentation/Siltation</p> <p>Range Grazing-Riparian Silviculture</p> <p>Nonpoint Source</p> <p>Temperature</p> <p>Range Grazing-Riparian</p> <p>Water Diversions</p> <p>Habitat Modification</p> <p>Removal of Riparian Vegetation</p> <p>Streambank Modification/Destabilization</p>	Medium	1161 Miles	
I	R	Trinity River, South Fork, Trinity River HU, South Fork HA	10621035	<p>Temperature</p> <p>Range Grazing-Riparian</p> <p>Water Diversions</p> <p>Habitat Modification</p> <p>Removal of Riparian Vegetation</p> <p>Streambank Modification/Destabilization</p>	Low	1161 Miles	

Approved by SWRCB:  
February 4, 2003

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# 2002 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENT

Approved by SWRCB:  
February 4, 2003

REGION TYPE	NAME	CAL/WATER WATERSHED	POLLUTANT/STRESSOR*	POTENTIAL SOURCES	TMDL PRIORITY	ESTIMATED SIZE AFFECTED	PROPOSED TMDL COMPLETION
1 R	Trinity River, Trinity River HU, Upper HA	10640003	Sedimentation/Siltation	<ul style="list-style-type: none"> <li>Silviculture</li> <li>Harvesting, Restoration, Residue Management</li> <li>Logging Road Construction/Maintenance</li> <li>Resource Extraction</li> <li>Surface Mining</li> <li>Placer Mining</li> <li>Mine Tailings</li> <li>Hydromodification</li> <li>Dam Construction</li> <li>Flow Regulation/Modification</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Channel Erosion</li> <li>Erosion/Siltation</li> <li>Natural Sources</li> <li>Nonpoint Source</li> </ul>	Medium	570 Miles	
1 L	Tule Lake and Lower Klamath Lake National Wildlife Refuge (Klamath River HU)	10591020	pH (high)	<ul style="list-style-type: none"> <li>Internal Nutrient Cycling (primarily lakes)</li> <li>Nonpoint Source</li> </ul>	Low	26998 Acres	
1 R	Van Duzen River, Eel River HU, Van Duzen River HA	11121012	Sedimentation/Siltation	<ul style="list-style-type: none"> <li>Range Grazing-Riparian</li> <li>Range Grazing-Upland</li> <li>Silviculture</li> <li>Harvesting, Restoration, Residue Management</li> <li>Logging Road Construction/Maintenance</li> <li>Silvicultural Point Sources</li> <li>Construction/Land Development</li> <li>Habitat Modification</li> <li>Removal of Riparian Vegetation</li> <li>Streambank Modification/Destabilization</li> <li>Channel Erosion</li> <li>Erosion/Siltation</li> <li>Natural Sources</li> </ul>	Medium	585 Miles	

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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R1



July 25, 2003

RWQCB  
REGION 1

JUL 25 2003

<input type="checkbox"/> HAL	<input type="checkbox"/> CWS	<input type="checkbox"/> FJB
<input type="checkbox"/> NPQ	<input type="checkbox"/> DH	<input type="checkbox"/> RH

Mr. William R. Massey, Chairman  
California Regional Water Quality Control Board  
North Coast Region  
5550 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403

Subject: Elk River Sensitive Watershed Nomination Public Comment Period

Dear Chairman Massey:

Thank you for your letter of response dated July 7, 2003 indicating that the Board had responded favorably to our request for postponement of action on the above referenced item to allow for extension of the public comment period. We share your concerns regarding the current conditions in the Elk River and the need to aggressively address water quality issues related to sediment and flow.

Data presented in the nomination appendices displays excerpts from PWA reports developed as supporting data for Palco's HCP. This data clearly indicates that a change in the traditional mode of conducting timber operations was in order. That change has taken place with the adoption of an HCP for Palco's ownership in the Elk River. As you are aware, the operational limitations placed on Palco's THPs under the Aquatics Conservation Plan are significant and have been determined by the signatory State and Federal agencies to maintain or restore streams covered by the HCP to a properly functioning condition. All plans approved since the approval of the HCP have included the mitigations required by the HCP Aquatics Conservation Plan and it is the Department's contention that this will lead to improved conditions in the Elk River Watershed.

The basis for the nomination includes three elements of concern to the Department. First, the nomination relies largely on information from 1997 reports and assessments completed by PWA and does not include current data from trend monitoring stations or turbidity monitoring conducted by Palco and the agencies since that time. We suggest that this data be collected, collated and evaluated so that the North Coast Regional Water Quality Control Board and the Board of Forestry and Fire Protection have a clear picture of how operations under HCP are performing relative to the pre-HCP period and what trends in water quality may be discernable.

Second, the nomination establishes a parallel strategy for evaluation of hillslope stability and operational limitations without indicating how this strategy relates spatially and operationally to the current HCP strategy for Hillslope Management in Section 6.3.3.7. A comparison of the two strategies is essential in order to determine the benefits to be gained through adoption of the Water Quality strategy. Comparison of hillslope failure rates for THPs approved under the HCP Hillslope Management provisions is a necessary element for development of an informed decision and a determination that the current HCP strategy is not working. For example, the California Geologic Survey reported in 2002 that a survey of the Elk River Watershed conducted at the request of CDF found no increase in landsliding in areas harvested under the HCP requirements.

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William R. Massey  
July 25, 2003  
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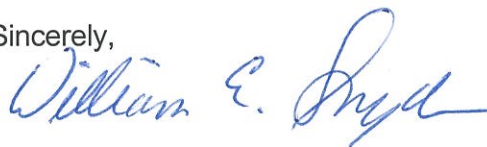
Additionally, a GIS based evaluation comparing the hillslope stability classifications proposed by Water Quality staff to the process utilized by Palco in their assessment of hillslope stability would be helpful. This comparison would facilitate quantifying what portions of the landscape are constrained under each of the alternatives.

Third, the nomination should discuss the current HCP Watershed Analysis process, status of the Watershed Analysis for the Elk River, and current approaches under that process for dealing with rates of harvest and establishment of thresholds. The Freshwater Watershed analysis has dealt with the issue of rate of harvest with the recently revised Disturbance Index approach. Approaches utilized in Elk River will also address levels of disturbance relative to sediment as well in establishing a disturbance Index at the planning watershed scale. It is not clear in the report why Water Board staff have not considered this approach, the degree to which staff have participated in the current Watershed Analysis process, and what additional benefits are expected to be derived through use of the Reid approach. Again, a comparison between the methodologies utilized in the Watershed Analysis process and the methodology proposed by Water Quality staff is necessary to provide the basis for a decision by the Board of Forestry and Fire Protection on this issue.

It is the Department's position that the HCP mitigations are resulting in improvement of overall watershed conditions in Elk River and that issues relative to sediment are being mitigated through road stormproofing, road upgrades, other site-specific mitigations, sediment savings sites, and implementation of the Hillslope Management strategy. The Department also believes that the Watershed Analysis process provides a viable alternative to the rate of harvest process proposed in the nomination documentation. For these reasons we recommend that this nomination not be forwarded to the Board of Forestry and Fire Protection until the additional information and comparative analyses the Department has suggested are incorporated.

Please let me know if you have any questions.

Sincerely,



William E. Snyder  
Deputy Director, Resource Management

cc: Stan Dixon, Chairman, State Board of Forestry and Fire Protection  
Art Baggett, Chairman, State Water Quality Control Board  
Susan Warner, Executive Officer, North Coast Regional Water Quality Control Board  
Robert Manne, President and CEO, Pacific Lumber Company

**S & W PROPERTIES**  
**730 - 7<sup>TH</sup> Street**  
**Eureka, CA 95501**

July 25, 2003

via FAX (707) 576-2557

Mr. Nathan Quarles  
North Coast Regional Water Quality Control Board  
5550 Skylane Drive, Suite A  
Santa Rosa, CA 95403

**Re: The NCRWQCB should not Recommend Sensitive Watershed Status of the Elk River Drainage, Humboldt County, to the California Board of Forestry**

Dear Mr. Quarles:

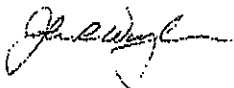
Thank you for the opportunity to comment on the NCRWQCB recommendation to designate the Elk River drainage of Humboldt County a Sensitive Watershed.

Upon review of the document package dated June 26, 2003, I see that this process is more developed than I expected given that the public comment period has not yet ended. Your opening letter has as its subject "*Consideration of Sensitive Watershed Nomination to the California Board of Forestry for the Elk River Watershed*". As I read further, I see that this consideration has evolved into a recommendation to the California Board of Forestry and Fire Protection endorsed by Susan Warner, (former) Executive Officer of the NCRWQCB. It does not appear that public comment can reverse the course of this process. This document appears to be another NCRWQCB end run around California's Forest Practice Rules to effectively prohibit Pacific Lumber Company from operations on its land holdings in the Elk River Watershed.

As an owner of forest lands in the Elk River Watershed, I am also affected by this unnecessary designation recommendation. The NCRWQCB seems to be at odds with most other state conservation agencies and new regulatory tools seem to emerge from the woodwork every few months to further the NCRWQCB's agenda. What has happened to the TMDL process? It is true that over a century of legacy logging practices were performed without consideration of watershed health and the effects of some of these early practices can still be seen. However, modern forestry practices performed under the California Forest Practice Rules and the PALCO Habitat Conservation Plan are benign in comparison to the logging practices of the past. We cannot change the past. I do not see how further throttling of PALCO and their heavily scrutinized timber management practices and mitigation of relic erosion problems will improve life for either fish or humans in Humboldt County.

Please document for the record that I am against the NCRWQCB's recommendation to designate the Elk River drainage of Humboldt County a Sensitive Watershed with all of the restrictive implications associated with additional regulations.

Sincerely,



John Winzler

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